UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

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UNITED STATES OF AMERICA.

Plaintiff,

Case:2:24-cr-20479
Judge: Michelson, Laurie J.
MJ: Grand, David R.
Filed: 08-28-2024 At 01:11 PM
INDI USA V KANYE LAMONT WOODS, ET A
L (LG)

v.

D-1 KANYE LAMONT WOODS, a/k/a "Jalin Thomas Woods,"

D-2 VICTOR MAURICE LINDSEY,

Violatior	ns:
18 U.S.C	C. § 922(g)(1)
18 U.S.C	C. § 922(o)

Defendants.

INDICTMENT

The Grand Jury charges:

COUNT ONE

18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm

D-1 KANYE LAMONT WOODS

On or about August 20, 2024, in the Eastern District of Michigan, the defendant, KANYE LAMONT WOODS, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, a

firearm, that is, one Glock, model 23, .40 caliber pistol, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

18 U.S.C. § 922(o) Illegal Possession of a Machinegun

D-1 KANYE LAMONT WOODS

On or about August 20, 2024, in the Eastern District of Michigan, defendant, KANYE LAMONT WOODS, knowingly possessed a machinegun, that is one Glock, model 23, .40 caliber pistol with affixed machinegun conversion device, in violation of Title 18, United States Code, Section 922(o) and 924(a)(2).

COUNT THREE

18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm

D-2 VICTOR MAURICE LINDSEY

On or about August 20, 2024, in the Eastern District of Michigan, the defendant, VICTOR MAURICE LINDSEY, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, firearms, that is:

- one Ruger, model 5.7, 5.7 caliber pistol;
- one Glock, 9mm pistol;
- one German Sport Guns, model GSG-16, .22LR caliber rifle;
- one Canik, model SFX Rival, 9mm pistol; and
- one Kalashnikov, model K12, 12-gauge shotgun,

in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The allegations contained in Counts One through Three of this Indictment are incorporated by reference to allege forfeiture under Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461(c).

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 922, the defendant, KANYE LAMONT WOODS and VICTOR MAURICE LINDSEY, shall forfeit to the United States any firearm and any ammunition involved in or used in any knowing violation of the offenses.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON UNITED STATES ATTORNEY

s/Craig F. Wininger

Craig F. Wininger Chief, Violent and Organized Crime Unit

s/Andrew R. Picek

Andrew R. Picek Assistant United States Attorney

Dated: August 28, 2024

United States District Court Eastern District of Michigan	Criminal Case Co	Judge: Mich MJ: Grand, I	Judge: Michelson, Laurie J. MJ: Grand, David R.	
NOTE: It is the responsibility of the Assistant U.	S. Attorney signing this form to co	Filed: 08-28-	-2024 At 01:11 PM KANYE LAMONT WOODS, ET A	
		Companion Cas	se Number:	
This may be a companion case based upon LCrR 57.10 (b)(4)¹:		Judge Assigned:		
☐ Yes ⊠ No		AUSA's Initials: S/ AP		
Case Title: USA v. Kanye	Lamont Woods, et al.			
County where offense oc	curred : Wayne 🔍			
Check One: ⊠Felony	☐Miso	lemeanor	□Petty	
Indictment/Ir		orior complaint [Case number: 24-30356, 24-30357] mplete Superseding section below].	
	<u>lon</u>	<u> "- jul"</u>		
Superseding to Case No:		Judge:		
Involves, for plea purp	ditional charges or defendar oses, different charges or a ct matter but adds the addit	dds counts.	s or charges below:	
Defendant name	Cha	rges	Prior Complaint (if applicable)	
Please take notice that the belo the above captioned case.	w listed Assistant Unite	ed States Atto	rney is the attorney of record for	
August 28, 2024	\bigwedge !	6		
Date	Andrew Pic			
		nited States Atto		
		t Street, Suite 48226-3277	2001	
	Phone: 313	-226-9652		
		-226-9100 -226 Andrew.F	Picek@usdoj.gov	
	Attorney Ba	ar #: OH00821	121	

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.